

I agree with the Commission that the 'phone' (voice) segments of the 80/75m and 40m amateur bands should be expanded as per petition 10-413 filed by the ARRL. In fact I applaud such a change. However, I note that a large number of additional restructuring petitions have been filed in response to WRC 2003, and I feel that these should be taken into account. I also note that granting 10-413 would still leave voice operation prohibited on large parts of the frequencies allocated to voice in the IARU Region 2 bandplan, and note the unfortunate effects that this has on international frequency harmonisation, and the resulting cross-border interference. For this reason the proposed changes do not go nearly far enough.

Further, I note that the proposals re recognition of Technician class telegraphy examination credit, although admirable, may be mooted by any reasonable implementation of WRC 2003. Specifically, there is no longer any international requirement for examination in telegraphy, nor has there been since July of 2003. The proposed wording changes to the rules, which refer to such a requirement, are therefore factually incorrect. Rather than awarding credit for a non-existent international requirement, the commission ought to be abolishing the corresponding domestic requirement. Doing so would make the issue addressed in this NPRM entirely moot.

I appreciate that many hours of effort have been expended in drafting this NPRM, and the end result is very welcome, not only for the changes discussed above but for other proposed changes also. However, it is an unfortunate fact that the world has moved on in the meantime. This means that other issues (and other petitions) must be addressed which also impinge on the changes proposed here.

Respectfully Submitted, Alun Palmer, BSc, N3KIP